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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:

Applications of CHARTER COMMUNICATIONS,
INC., TIME WARNER CABLE INC., and
BRIGHT HOUSE NETWORKS, LLC for Consent To
Assign or Transfer Control of Licenses and
Authorizations

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WC Dkt. No. 16-197

**INDEPENDENT COMPLIANCE OFFICER'S REPORT ON CHARTER'S
INTERCONNECTION PARTIES AND DATA FILING FOR FIRST QUARTER 2017**

JUNE 9, 2017

Hon. Barbara S. Jones (Ret.)
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INTRODUCTION

Pursuant to the Settlement-Free Interconnection Condition (the “Interconnection Condition”) set forth in Appendix B of the order (the “Merger Order”) issued on May 10, 2016 by the Federal Communications Commission (“FCC” or “Commission”) approving the merger of Charter Communications, Inc. (“Legacy Charter”), Time Warner Cable Inc. (“Legacy TWC”), and Advance/Newhouse Partnership (“Legacy Bright House”) (as a combined entity, “Charter” or the “Company”), the Independent Compliance Officer (“ICO”) hereby submits this report addressing Charter’s April 11, 2017 filing. *See* Mem. Op. & Order, MB Dkt. No. 15-149, FCC 16-59, May 10, 2016; App’x B § IX(3)(e).

EXECUTIVE SUMMARY

For the reasons set forth below, the ICO believes Charter’s April 11, 2017 report (the “Q1 2017 Report”) is in compliance with the terms of the Interconnection Condition.

OBSERVATIONS

On January 31, 2017, the ICO filed her first report pursuant to the Merger Order (the “First ICO Report”). Since that time, Charter has maintained the system detailed in the First ICO Report for generating quarterly interconnection reports. As part of her monitoring duties, over the past several months the ICO has conducted additional interviews of Charter personnel responsible for generating the quarterly reports. Those interviews have increased the ICO’s understanding of how the reports are generated and the meaning of the data reported therein. The ICO’s observations and assessment of the Q1 2017 Report are set forth below.

I. Charter’s Q1 2017 Report

The Q1 2017 Report includes all the information required by the Interconnection Condition. *See* App’x B § III(3)(a), (b), and (c). The counterparties corresponding to each Interconnect Exchange Point are listed on both the “Summary” and “Utilization” sheets of the

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Report. “Aggregate link capacity between the Company and each Interconnection Party at that Interconnect Exchange Point” is listed next to the name of each Interconnection Party on the Summary sheet. The Summary sheet also provides the aggregate traffic exchanged in each direction (upstream and downstream), measured by the 95th percentile method. Finally, the Utilization sheet displays the percentage of time within the reporting period that each port was over 75% capacity in the dominant direction.

II. Overall Assessment of the Q1 2017 Report

A. Reliability of the Process

The ICO remains confident that the Q1 2017 Report is sufficiently accurate to comply with the Interconnection Condition. First, and as set forth in the First ICO Report, the data and software program used to generate the Q1 2017 Report is the same data and software the Circuit Operations Group uses every day to monitor the Company’s networks. The accuracy of such data is necessary for Charter properly to maintain and manage the health of its network, which is critical to Charter’s ability to deliver service to its customers. Second, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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[END HIGHLY CONFIDENTIAL INFORMATION]

B. The Data

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[END HIGHLY CONFIDENTIAL INFORMATION]

RECOMMENDATIONS

The ICO does not make any recommendations with respect to Charter's quarterly interconnection reports. The ICO is due to file a report on Charter's overall compliance with the

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Interconnection Condition in August 2017. The ICO will include her recommendations, if any, with respect to the Interconnection Condition in that report.